

Message

From: Rosenblatt, Daniel [Rosenblatt.Dan@epa.gov]
Sent: 1/17/2020 3:46:08 PM
To: Goodis, Michael [Goodis.Michael@epa.gov]; Paisley-Jones, Claire [Paisley-Jones.Claire@epa.gov]
CC: Aubee, Catherine [Aubee.Catherine@epa.gov]
Subject: RE: Majorly Edited 24(c) Memo -- SARAH next steps!! -- New OPP Comments
Attachments: Administrator Memo 24(c) Jan 2020 RPK ADD SS djr - 1-17-20Redline.docx

Mike – here's some comments on this.

Can I please loop in OGC and/or Rick on this?

The OMB form to me is pretty awkward and I don't believe has been much considered by OGC. For instance – in executing their recent SLN to observe a cut off date – Indiana has marked the box about the federal registration not being as 'safe and/or efficacious...".

From: Goodis, Michael <Goodis.Michael@epa.gov>
Sent: Friday, January 17, 2020 10:24 AM
To: Paisley-Jones, Claire <Paisley-Jones.Claire@epa.gov>
Cc: Rosenblatt, Daniel <Rosenblatt.Dan@epa.gov>; Aubee, Catherine <Aubee.Catherine@epa.gov>
Subject: RE: Majorly Edited 24(c) Memo -- SARAH next steps!! -- New OPP Comments

Thanks
Any word when we hear back from OGC?

Michael L. Goodis, P.E.
Director, Registration Division (RD)
Office of Pesticide Programs (OPP)

Phone 703-308-8157
Room S7623

From: Goodis, Michael
Sent: Friday, January 17, 2020 9:24 AM
To: Paisley-Jones, Claire <Paisley-Jones.Claire@epa.gov>
Cc: Rosenblatt, Daniel <Rosenblatt.Dan@epa.gov>; Aubee, Catherine <Aubee.Catherine@epa.gov>
Subject: FW: Majorly Edited 24(c) Memo -- SARAH next steps!! -- New OPP Comments

Claire

Attached is the latest version from the IO.
Alex would like to include some information in the memo on the steps in the process to disapprove a 24(c).
Can you take a run at it please? I think we had some of it in the previous version we provided to the IO.

Michael L. Goodis, P.E.
Director, Registration Division (RD)
Office of Pesticide Programs (OPP)

Phone 703-308-8157
Room S7623

From: Stillman, Sarah <Stillman.Sarah@epa.gov>
Sent: Friday, January 17, 2020 9:05 AM
To: Keigwin, Richard <Keigwin.Richard@epa.gov>; Dunn, Alexandra <dunn.alexandra@epa.gov>; Bolen, Derrick <bolen.derrick@epa.gov>; Tyler, Tom <Tyler.Tom@epa.gov>
Cc: Grable, Melissa <Grable.Melissa@epa.gov>; Goodis, Michael <Goodis.Michael@epa.gov>
Subject: RE: Majorly Edited 24(c) Memo -- SARAH next steps!! -- New OPP Comments

Thank you Rick.

I addressed your comments and made additional edits. I am attaching a redlined version and a clean(er) version of this memo.

Let me know if you have any questions.

Sarah

From: Keigwin, Richard <Keigwin.Richard@epa.gov>
Sent: Friday, January 17, 2020 8:58 AM
To: Dunn, Alexandra <dunn.alexandra@epa.gov>; Stillman, Sarah <Stillman.Sarah@epa.gov>; Bolen, Derrick <bolen.derrick@epa.gov>; Tyler, Tom <Tyler.Tom@epa.gov>
Cc: Grable, Melissa <Grable.Melissa@epa.gov>; Goodis, Michael <Goodis.Michael@epa.gov>
Subject: RE: Majorly Edited 24(c) Memo -- SARAH next steps!! -- New OPP Comments

Ex. 5 Deliberative Process (DP)

It may be helpful to re-engage with OGC. In the meantime, we can work with Sarah to add some language about the steps in the process for disapproving a 24(c). We can look back at the process we used in 2017 when then-Administrator Pruitt decided to deny the cannabis 24(c)'s.

From: Dunn, Alexandra <dunn.alexandra@epa.gov>
Sent: Friday, January 17, 2020 8:38 AM
To: Keigwin, Richard <Keigwin.Richard@epa.gov>; Stillman, Sarah <Stillman.Sarah@epa.gov>; Bolen, Derrick <bolen.derrick@epa.gov>; Tyler, Tom <Tyler.Tom@epa.gov>
Cc: Grable, Melissa <Grable.Melissa@epa.gov>; Goodis, Michael <Goodis.Michael@epa.gov>
Subject: RE: Majorly Edited 24(c) Memo -- SARAH next steps!! -- New OPP Comments

I made a few more edits; I think the table should come before the appendix. Also I think we should narratively state what we plan to do....ie 1) disapprove (state) by ??? (date?)

Also it isn't clear from this who would do this -- doesn't the Administrator sign --- I think there should be a very clear

- 1.
- 2.
- 3.
- 4.

Statement of what we are recommending take place.

Taking off for DC now; see you all about 1245!

Alexandra Dapolito Dunn, Esq.
Assistant Administrator
Office of Chemical Safety and Pollution Prevention
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(202) 564-2910
dunn.alexandra@epa.gov

From: Keigwin, Richard <Keigwin.Richard@epa.gov>
Sent: Friday, January 17, 2020 6:21 AM
To: Stillman, Sarah <Stillman.Sarah@epa.gov>; Dunn, Alexandra <dunn.alexandra@epa.gov>; Bolen, Derrick <bolen.derrick@epa.gov>; Tyler, Tom <Tyler.Tom@epa.gov>
Cc: Grable, Melissa <Grable.Melissa@epa.gov>; Goodis, Michael <Goodis.Michael@epa.gov>
Subject: RE: Majorly Edited 24(c) Memo -- SARAH next steps!! -- New OPP Comments

Some additions to address some requests from Sarah. I also wanted to flag two comments:

Ex. 5 Deliberative Process (DP)

From: Stillman, Sarah <Stillman.Sarah@epa.gov>
Sent: Thursday, January 16, 2020 3:02 PM
To: Dunn, Alexandra <dunn.alexandra@epa.gov>; Bolen, Derrick <bolen.derrick@epa.gov>; Keigwin, Richard <Keigwin.Richard@epa.gov>; Tyler, Tom <Tyler.Tom@epa.gov>
Cc: Grable, Melissa <Grable.Melissa@epa.gov>
Subject: RE: Majorly Edited 24(c) Memo -- SARAH next steps!!

+ Melissa

Alex,

Please find attached the revised section 24(c) memo.

I thought the purpose of this memo was to recommend we start disapproving pending/incoming section 24(c) requests so I added a "proposed next steps" section back in.

Let me know what you think.

Sarah

From: Dunn, Alexandra <dunn.alexandra@epa.gov>

Sent: Wednesday, January 15, 2020 6:21 PM

To: Stillman, Sarah <Stillman.Sarah@epa.gov>; Bolen, Derrick <bolen.derrick@epa.gov>; Keigwin, Richard <Keigwin.Richard@epa.gov>; Tyler, Tom <Tyler.Tom@epa.gov>

Subject: Majorly Edited 24(c) Memo -- SARAH next steps!!

Sarah,

I have a much different idea about how to present this to the Administrator. I think you'll be able to understand my approach when you see all the edits and deletions I made. I ran out of time to continue working on the "implementation" section (the regs, what we would do, which states are up next, what is the timing?). Can you work on this on Thursday when I'm on travel and get it back to me so I can work more on it on Friday?

I really think we talk too much about dicamba here. While that may have led to increased 24(c)'s, the "misuse" as I call it has been going on for a long time and it is time for us to correct ourselves.

Give it a shot along my new structure and let's talk Friday.

Thanks.